

**UNITED STATES DISTRICT COURT**  
for the  
Eastern District of Michigan

United States of America  
v.

Lamare Ladanny Fullove

Case: 2:22-mj-30199  
Assigned To : Unassigned  
Assign. Date : 4/27/2022  
Description: CMP USA v. SEALED  
MATTER (SO)

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of November 18, 2020 in the county of Wayne in the  
Eastern District of Michigan SD, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
21 U.S.C. § 841(a)(1)	Possession with Intent to Distribute Controlled Substances
21 U.S.C. . § 846	Conspiracy with the Intent to Distribute Controlled Substances
18 U.S.C. § 1716	Substances Mailed

This criminal complaint is based on these facts:  
SEE ATTACHED AFFIDAVIT

☐ Continued on the attached sheet.

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

Date: April 27, 2022

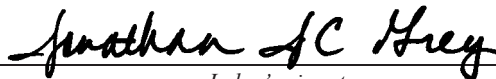
City and state: Detroit, Michigan



*Complainant's signature*

Michael Van de Putte, Inspector, U.S. Postal Service

*Printed name and title*



*Judge's signature*

Hon. Jonathan J.C. Grey, United States Magistrate Judge

*Printed name and title*

**AFFIDAVIT**

I, Michael Van de Putte, being duly sworn, hereby depose and say:

1. I am a United States Postal Inspector, currently assigned to the Allen Park Domicile within the Detroit Division and have been so employed since June 9, 2007. I am currently assigned to Prohibited Mailings team. My duties and responsibilities as a United States Postal Inspector include, but are not limited to, investigations wherein the United States mail system is used for the purpose of transporting non-mailable matter, including controlled substances such as marijuana, cocaine, methamphetamine, and heroin, in violation of Title 21, United States Code, Sections 841(a)(1), 846, 843(b), and substances mailed in violation of Title 18, United States Code, Section 1716.
2. The information contained in this affidavit is based on my training, experience, personal knowledge, observations during the course of this investigation, information provided to me by other law enforcement officers, witnesses, and review of documents and communications with others who have personal knowledge of the events and circumstances described herein. Because this affidavit is submitted for the limited purpose of establishing probable cause in support of the application for a criminal complaint, it does not set forth each and every fact that I or others have learned during the course of this investigation.
3. This affidavit is filed in support of a criminal complaint naming LAMARE LADANNY FULLOVE, who was involved in a scheme to traffick narcotics as outlined below in violation of Title 21, United States Code, Sections

841(a)(1), 846, 843(b), and substances mailed in violation of Title 18, United States Code, Section 1716.

4. On or about November 18, 2020, Postal Inspectors engaged in interdiction activities in the Eastern District of Michigan identified a parcel which displayed several characteristics indicating it may contain a quantity of controlled substances or proceeds from the sale of controlled substances. The parcel is a USPS Priority Mail Express mail piece affixed with USPS tracking number “EJ 491 003 420 US,” [subject parcel] addressed to “DeJenae Love, 7724 Greenview, Detroit, MI 48228” with a return address of “Charles Johnson, 4014 Norfolk St, Houston, TX 77027.” Further, the parcel weighed approximately 10 pounds, 4 ounces and bore \$100.95 in postage and fees.
5. On about November 19, 2020, a federal search warrant authorized by U.S. Magistrate Judge Curtis Ivy Jr. was executed on Priority Mail Express parcel EJ 491 003 420 US. Contents of the parcel were found to be approximately 470g of a white powder which field tested positive as cocaine, 560g of small, multi-colored pills suspected to be ecstasy, and 130g of tobacco in the form of cigars.
6. On or about December 1, 2020, Affiant submitted the field-tested positive cocaine and suspected ecstasy to the Northville, MI location of the Michigan State Police Forensic Laboratory. On or about December 15, 2020, Affiant was made aware forensic testing of the suspected narcotics had been completed. The report issued by forensic examiners confirms the positive field test of the cocaine. The forensic analysis report also stated the pills were not, in fact, ecstasy

(MDMA) as believed but methamphetamine.

7. On or about December 9, 2020, Affiant sent the parcel and all non-narcotic contents which included a video game controller box, dual pack wrapped deodorant, and other items to the USPIS Forensic Laboratory Services (FLS) group for forensic analysis. The forensic analysis request was for development of latent fingerprints and then to compare any latent prints to the fingerprints of FULLOVE as well as compare suitable latent prints to known prints in the FBI's automated fingerprint database.
8. On or about July 18, 2021, FLS submitted a report of their findings. According to the report, FLS was able to develop 33 latent fingerprints and four latent palm prints. Comparison to the known fingerprints of FULLOVE resulted in 25 of the fingerprints identified as belonging to FULLOVE. All 4 of the developed latent palm prints were found to belong to FULLOVE indicating he put the mailing together, including the narcotics within. The laboratory analysis report regarding the fingerprints states the following:
  - Lamare Shapmar Fullove, FBI No. 216108JD0, Exhibit K-1
  - One fingerprint on part of Exhibit 1, a clear plastic box insert from the Sony DUALSHOCKS® box
  - Five fingerprints on part of Exhibit 1, clear plastic packaging from around a double pack of antiperspirant
  - Eight fingerprints on part of Exhibit 1, a plastic bag containing George A-Shirts
  - One fingerprint on part of Exhibit 1, a plastic bag containing

Hanes T-Shirts

- Three fingerprints on part of Exhibit 1, the adhesive side of clear tape removed from the exterior of the brown cardboard box
- Three fingerprints on part of Exhibit 1, the adhesive side of Priority Mail Express tape removed from the brown cardboard box
- Two fingerprints and two palm prints on part of Exhibit 1, the non-adhesive side of the Priority Mail Express label
- Two fingerprints and two palm prints on part of Exhibit 1, the exterior of the brown cardboard box

9. On or about December 3, 2020, Inspectors utilizing postal databases identified several Internet Protocol (IP) addresses including 2607:FB90:893C:8435:0000:0006:55F6:FA01 and the phone number 734-709-9349 which had been used to track the mailing as well as contact the USPS Customer Care Center looking for the parcel when it did not arrive on the expected date.

10. Affiant utilized the information from the public records database to request the assistance of Drug Enforcement Agency Group #7 Task Force Officers Michael Post and Daniel Horning. On or about December 8, 2020, Horning submitted administrative subpoenas regarding the IP and phone information used to track the mailing. On or about January 4, 2021, the administrative subpoena information was returned from T-Mobile. The subpoena response stated IP address 2607:FB90:893C:8435:0000:0006:55F6:FA01, used on or

about November 18, 2020, and other times to track the mailing, was assigned at the time to T-Mobile account number 963935463 utilizing the phone number 586-213-0904 and in the name of LAMARE S FULLOVE at 19531 Beaverland St, Detroit, MI 48219.

11. The aforementioned facts provide probable cause to believe that during 2020, LAMARE LADANNY FULLOVE trafficked in controlled substances in violation of Title 18 U.S.C. Title 21, United States Code, Sections 841(a)(1), 846, 843(b), and substances mailed in violation of Title 18, United States Code, Section 1716.



Michael A. Van de Putte, United States Postal Inspector

Subscribed and sworn before me this 27th day of April, 2022.



Hon. Jonathan J.C. Grey, U.S. Magistrate Judge